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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 HEATHER FOSTER
9

Case No. 3:18-CV-0438-MMD-CBC

10 Plaintiff,

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF
TO FILE A RESPONSE TO DEFENDANT'S**

11 vs.

(First Request)

12 WASHOE COUNTY.
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14 Defendant.
15 _____/

16 On August 13, 2019, Defendant Washoe County, through Christopher J. Hicks, Washoe
17 County District Attorney, and Herbert B. Kaplan, Washoe County Deputy District Attorney, filed a
18 Motion to Dismiss the Complaint in this matter (EC No.8). Plaintiff's Response is due August 27,
19 2019. The parties, through their respective counsel, hereby stipulate and agree to extend the time
20 period for Plaintiff to file her opposition, up to and including **September 3, 2019**, a one week
21 extension.

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1 Good cause exists for the extension of time because Plaintiff's counsel, Terri Keyser-
2 Cooper, is recovering from major spinal surgery in June 2019 and complications therefrom. Ms.
3 Keyser-Cooper is improving, definitely on the mend, but is operating at much diminished capacity,
4 one-third her previous daily work output.

5 Dated this 20th day of August 2019

6 LAW OFFICE OF TERRI KEYSER-COOPER

7 By: /s/ Terri Keyser-Cooper
8 TERRI KEYSER-COOPER
9 *Attorney for Plaintiff Heather Foster*

10 Dated this 20th day of August 2019

11 WASHOE COUNTY DISTRICT ATTORNEY'S OFFICE

12 BY: /s/ Herbert B. Kaplan
13 HERBERT B. KAPLAN
14 CHRISTOPHER J. HICKS
15 *Attorney for Washoe County*

16 **ORDER**

17 **IT IS SO ORDERED.**

18 **Dated this 23rd day of August 2019**

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21 **UNITED STATES DISTRICT JUDGE**
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